Example D51 - SFS Pump Removal of Spent Fuel Decay ITAAC Closure Notification

XX/YY/ZZZZ (Date)
To: NRC
From: {Name of Licensee}
{Site Name and Unit #(s)}
{Docket #(s)}

Subject: Completion of ITAAC 2.3 07.08.ii

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of {Site Name and Unit #(s)} Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3 07.08.ii to verify that each Spent Fuel Pool Cooling System (SFS) pump produces at least 900 Gallons per Minute (gpm) through its heat exchanger in accordance with 10 CFR 52.99(c)(1). The closure process for this ITAAC is based on the guidance described in NEI 08-01 (Reference 1).

ITAAC Statement

Design Commitment:

The SFS provides the nonsafety-related function of removing spent fuel decay heat using pumped flow through a heat exchanger.

Inspections, Tests, Analyses:

ii) Testing will be performed to confirm that each SFS pump provides flow through its heat exchanger when taking suction from the SFP and returning flow to the SFP.

Acceptance Criteria:

ii) Each SFS pump produces at least 900 gpm through its heat exchanger.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the SFS provides the nonsafety-related function of removing spent fuel decay heat using pumped flow through a heat exchanger.

Testing of the SFS pumps was performed after construction / component testing completion and prior to hot functional water testing. The testing was performed using Preoperational Test Procedure APP-SFS-T1P-502 (Reference 3) and the results

confirmed that each SFS pump (listed in Attachment A) provides flow through its heat exchanger when taking suction from the Spent Fuel Pool (SFP) and returning flow to the SFP. The testing verified that each SFS pump produces at least 900 gpm through its heat exchanger as indicated by the respective SFS Pump Discharge Flow Sensor and adjusted for instrument uncertainty.

The Test Results Report (TRR) completed as required by ITP Test Results Report Procedure APP-GW-TSP-328 (Reference 4) verifies that each SFS pump produces at least 900 gpm through its heat exchanger.

ITAAC-Related Construction Finding Review

In accordance with XXX-XXX-XXX (project specific procedure for ITAAC completion), {Licensee} performed a review of all ITAAC-related construction findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC-related construction findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3 07.08.ii (Reference 2) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, [Licensee] hereby notifies the NRC that ITAAC 2.3 07.08.ii was performed for Plant/Unit XYZ, and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

We request NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact XXX at xxx-xxx-xxxx.

Sincerely,

{Signature of Licensee Representative}
{Typed Name of Licensee Representative}
{Title of Licensee Representative}

References (available for NRC inspection)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. ITAAC 2.3 07.08.ii Completion Package
3. Completed Preoperational Test Procedure APP-SFS-T1P-502 which includes the associated Test Results Report (TRR)
4. ITP Test Results Report Procedure APP-GW-TSP-328

Attachment A

Partial Excerpt from Design Control Document Table 2.3.7-3

Table 2.3.7-3			
Component Name	**Tag No.**	**Display**	**Control Function**
SFS Pump 1A	SFS-MP-01A	Yes (Run Status)	Start
SFS Pump 1B	SFS-MP-01B	Yes (Run Status)	Start